

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC. and FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00996-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FOURTH REQUEST

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG") and Fidelity National Title Insurance Company ("Fidelity") (collectively "Defendants") and plaintiff Wells Fargo Bank, N.A. ("Wells Fargo"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On May 24, 2021 Wells Fargo filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On May 24, 2021, Fidelity removed the instant case to the United States District
4 Court for the State of Nevada (ECF No. 1);

5 3. On June 24, 2021, the Court granted the Parties' first stipulation to extend the
6 deadlines for Defendants to respond to the complaint (ECF No. 12);

7 4. On July 30, 2021, the Court granted the Parties' second stipulation to extend the
8 deadlines for Defendants to respond to the complaint through September 7, 2021 (ECF No. 21);

9 5. On September 3, 2021, the Court granted the Parties' third stipulation to extend the
10 deadlines for Defendants to respond to the complaint through October 7, 2021 (ECF No. 24);

11 6. Counsel for Defendants request a 2-week extension, through and including
12 Thursday, October 21, 2021 for Defendants to file their respective responses to Wells Fargo's
13 complaint to afford Defendants' counsel additional time to review and respond to Wells Fargo's
14 complaint.

15 7. Counsel for Wells Fargo does not oppose the requested extension;

16 8. This is the fourth request for an extension made by counsel for Defendants, which
17 is made in good faith and not for the purposes of delay.

18 9. This stipulation is entered into without waiving any of Defendants' objections
19 under Fed. R. Civ. P. 12.

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' deadline to respond to the complaint is hereby
2 extended through and including Thursday, October 21, 2021.

3 Dated: October 5, 2021

SINCLAIR BRAUN LLP

4
5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
9 INC. and FIDELITY NATIONAL TITLE
10 INSURANCE COMPANY

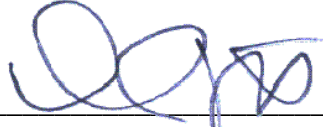
11 Dated: October 5, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Lindsay D. Dragon
13 LINDSAY D. DRAGON
14 Attorneys for Plaintiff
15 WELLS FARGO BANK, N.A.

16 **IT IS SO ORDERED.**

17 DATED this 6th day of October, 2021.

18
19
20
21
22
23
24
25
26
27
28

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE